

**FILED**  
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U.S. DISTRICT COURT E.D.N.Y.  
★ AUG 03 2012 ★

EJK:NR  
F.#2011R00738

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**BROOKLYN OFFICE**

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UNITED STATES OF AMERICA

S U P E R S E D I N G  
I N D I C T M E N T

- against -

JAISHREE ARBUCKLE-PIERRE,  
also known as "Jaishree  
Bailey," and  
LAUREL SOBERS,

Cr. No. 12-452(S-1)(ENV)  
(T. 18, U.S.C., §§ 371,  
1028A(a)(1), 1028A(b),  
1028A(c)(11), 2 and 3551  
et seq.; T. 42, U.S.C.,  
§ 408(a)(7)(B))

Defendants.

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THE GRAND JURY CHARGES:

INTRODUCTION TO ALL COUNTS

At all times relevant to this Indictment, unless  
otherwise indicated:

1. The defendants JAISHREE ARBUCKLE-PIERRE, also known  
as "Jaishree Bailey," and LAUREL SOBERS, together with others,  
engaged in a fraudulent scheme for the purpose of obtaining things  
of value from retail stores.

2. The defendant JAISHREE ARBUCKLE-PIERRE was an  
employee of Kings County Hospital in Brooklyn, New York ("Kings  
County Hospital"). The defendant LAUREL SOBERS was an associate  
and former neighbor of JAISHREE ARBUCKLE-PIERRE.

3. To effectuate the scheme, the defendants JAISHREE  
ARBUCKLE-PIERRE and LAUREL SOBERS provided another co-conspirator  
whose identity is known to the Grand Jury ("Co-conspirator #1")

with the names, dates of birth and social security account numbers of individuals, each of whom was an employee of Kings County Hospital (collectively, the "Fraud Victims").

4. Co-conspirator #1 then used the information described in paragraph three to fraudulently obtain identification cards (the "Fraudulent Identification Cards").

5. Co-conspirator #1 and another individual whose identity is known to the Grand Jury ("Co-conspirator #2") then used the names, dates of birth and social security account numbers of the Fraud Victims, in conjunction with the Fraudulent Identification Cards, to obtain credit from retail stores and purchase consumer items from retail stores.

COUNT ONE

(Conspiracy to Commit Social Security Fraud)

6. The allegations contained in paragraphs one through five are hereby realleged and incorporated as if fully set forth in this paragraph.

7. In or about and between November 2010 and April 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAISHREE ARBUCKLE-PIERRE, also known as "Jaishree Bailey," and LAUREL SOBERS, together with others, did knowingly and intentionally conspire to deceive to falsely represent numbers to be the social security account numbers assigned by the Commissioner of the Social Security Administration to Co-

conspirator #1 and Co-conspirator #2, when in fact, as they then and there well knew and believed, such account numbers were not the social security account numbers assigned by the Commissioner of the Social Security Administration to Co-conspirator #1 and Co-conspirator #2, for the purpose of obtaining things of value from one or more persons and with intent to deceive, contrary to Title 42, United States Code, Section 408(a)(7)(B).

8. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants JAISHREE ARBUCKLE-PIERRE and LAUREL SOBERS, together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

a. In or about and between November 2010 and April 2011, both dates being approximate and inclusive, the defendant JAISHREE ARBUCKLE-PIERRE provided one or more names, dates of birth and social security account numbers of the Fraud Victims to LAUREL SOBERS.

b. In or about and between November 2010 and February 2011, both dates being approximate and inclusive, Co-conspirator #1 obtained one or more names, dates of birth and social security account numbers of the Fraud Victims from LAUREL SOBERS.

c. On or about November 18, 2010, Co-conspirator #1 used the name, date of birth and social security account number of Jane Doe #1, an employee of Kings County Hospital whose identity is known to the Grand Jury, to fraudulently secure an identification card.

d. On or about November 18, 2010, Co-Conspirator #1 made fraudulent purchases at Sears Department Store in Manchester, Connecticut.

e. On or about March 24, 2011, LAUREL SOBERS provided Co-conspirator #1 with the names, dates of birth and social security account numbers of Jane Doe #2 and Jane Doe #3, employees of Kings County Hospital whose identities are known to the Grand Jury.

f. On or about April 21, 2011, the defendant JAISHREE ARBUCKLE-PIERRE, together with others, provided Co-conspirator #1 with the names, dates of birth and social security account numbers of Jane Doe #4 and Jane Doe #5, employees of Kings County Hospital whose identities are known to the Grand Jury.

g. On or about April 22, 2011, LAUREL SOBERS provided Co-conspirator #1 with the name, date of birth and social security account number of Jane Doe #6, an employee of Kings County Hospital whose identity is known to the Grand Jury.

(Title 18, United States Code, Sections 371 and 3351 et seq.)

COUNT TWO  
(Fraudulent Use of Social Security Numbers)

9. The allegations contained in paragraphs one through five are hereby realleged and incorporated as if fully set forth in this paragraph.

10. In or about and between November 2010 and April 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAISHREE ARBUCKLE-PIERRE, also known as "Jaishree Bailey," and LAUREL SOBERS, together with others, for the purpose of obtaining things of value from one or more persons and with intent to deceive, did falsely represent numbers to be the social security account numbers assigned by the Commissioner of the Social Security Administration to Co-conspirator #1 and Co-conspirator #2, when in fact, as they then and there well knew and believed, such account numbers were not the social security account numbers assigned by the Commissioner of the Social Security Administration to Co-conspirator #1 and Co-conspirator #2.

(Title 42, United States Code, Section 408(a)(7)(B); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE  
(Aggravated Identity Theft)


11. The allegations contained in paragraphs one through five are hereby realleged and incorporated as if fully set forth in this paragraph.

12. In or about and between November 2010 and April 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAISHREE ARBUCKLE-PIERRE, also known as "Jaishree Bailey," and LAUREL SOBERS, together with others, during and in relation to the crimes charged in Counts One and Two, did knowingly and intentionally transfer, possess and use, without lawful authority, one or more means of identification of another person, to wit: names and social security account numbers belonging to the Fraud Victims, knowing that the means of identification belonged to another person.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(11), 2 and 3551 et seq.)

A TRUE BILL

  
FOREPERSON

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No.

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**UNITED STATES DISTRICT COURT**

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*JAISHREE ARBUCKLE-PIERRE and LAUREL SOBERS,*

Defendants.

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**SUPERSEDING INDICTMENT**

(T. 18, U.S.C., §§ 371, 1028A(a)(1), 1028A(b),  
1028A(c)(11), 2 and 3551 et seq.; T. 42, U.S.C., § 408(a)(7)(B))

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*A true bill.*

*Mawa Duhaney*

Foreman

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Filed in open court this \_\_\_\_\_ day, of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

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*Nathan Reilly, Assistant U.S. Attorney (718-254-6196)*